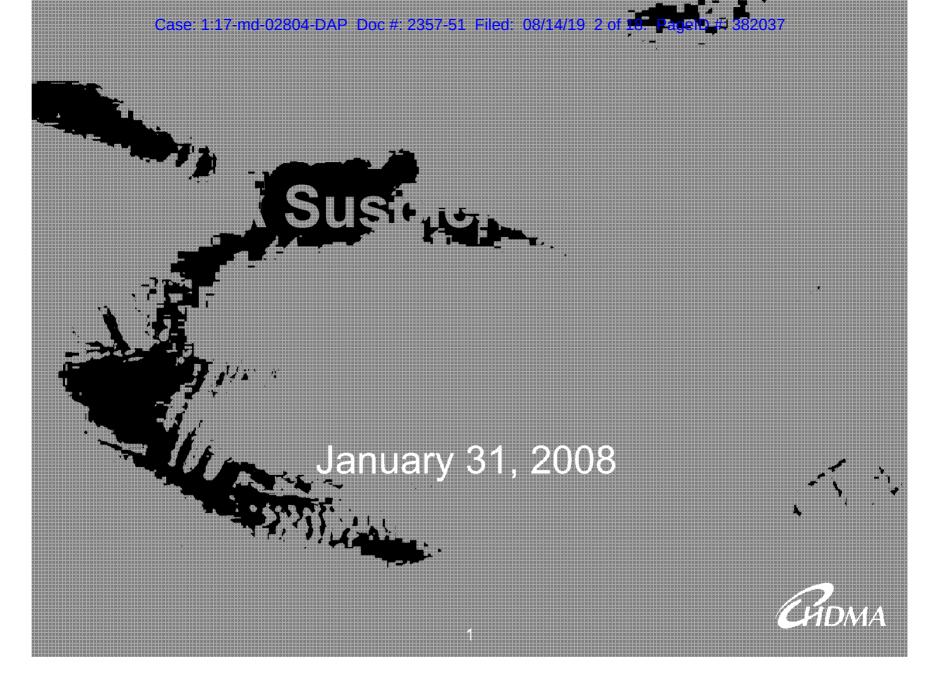
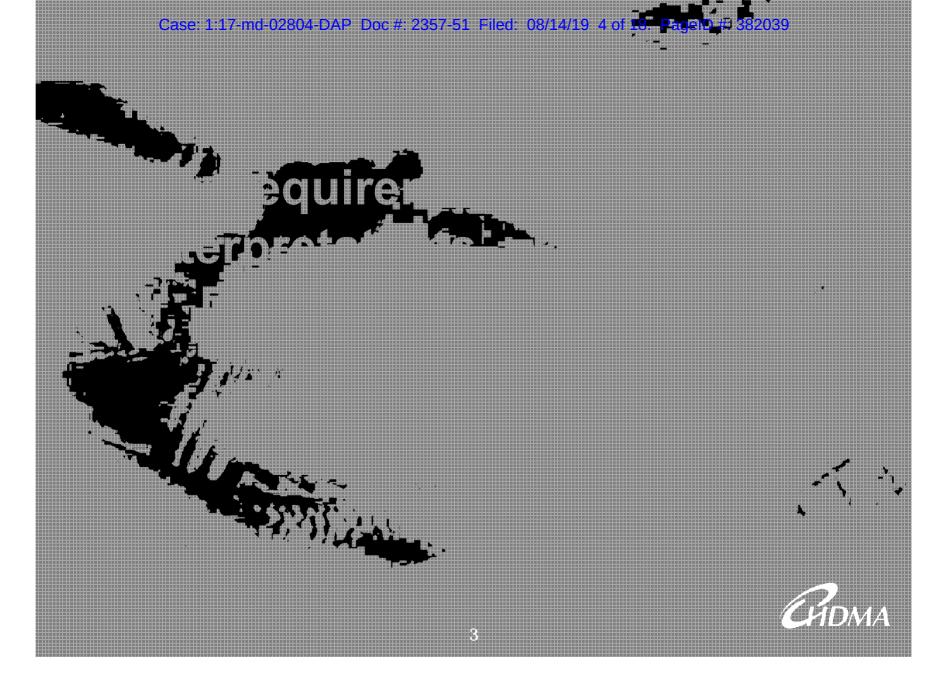
PSJ3 Exhibit 386



- Review Anti-Trust and Anti-Harassment Policies
- Background
 - DEA SO requirements
 - . ⊢HDMA BP's – efforts to date
- Legal and Policy Perspective
- Potential Best Practices; questions for Attendees
- Discussion; Member input
- "Model" modifications; areas for further review
- Next steps; additional DEA issues



- Best Practices identified as a possible solution 10/16/07 HDMA DEA Meeting
- Recommendation from Outside Counsel to move forward 12/19/07
- Request for members' existing BPs 01/03/08
- Follow-up requests for copies and requests for "interviewees" 01/07 through 01/11/08
- Presentation to Pain Coalition 01/10/08
- Established a consulting contract with Wilson Security Services 01/11/08
- Pharmacy Association Meeting (NACDS, APhA, NCPA) 01/14/08
- Interviews week of 01/21/08
- Review of first draft BP's 01/31/08

Desired Outcome: Agree upon fundamentals of distribution industry BP for Suspicious Orders for GPPC review; eventually provide to DEA

- To get there, we'll:
 - Review circulated draft & request your input
 - Reach agreement where we can
 - i.d., areas for further consideration



- Information gathering
 - Distributor requests information about the potential customers' background, customer base, credit, etc.
- Information review
 - distributor verifies completeness and reviews the information
 - Investigation
 - Distributor seeks additional background information e.g, check Fed. Reg. for actions against potential customer

Background notes

- Regulation's requirements.
- Distinguish between order vs. sale
- di "suspicious" upon order receipt

stem design

- i.d. product Characteristics; establish groups or "families" of drugs based on class of trade &/or product
- Develop "Thresholds"

 - Calculate "average" orders for "families" ld. orders of "unusual" size/frequency/pattern
- Stop shipments

- Designating an investigator(s)
 - Experience, qualifications
- Elements of the investigation
 - Review prior orders for trends/discrepancies
 - Interview customer
 - Verify customer input
 - **Documentation**
- Shipment decisions
 - Releasing/cancelling shipment process
 - 4 decision options

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Filing a SO ReportImmediate vs. monthly

- orrespondence
 - here/how to send
- ocumentation

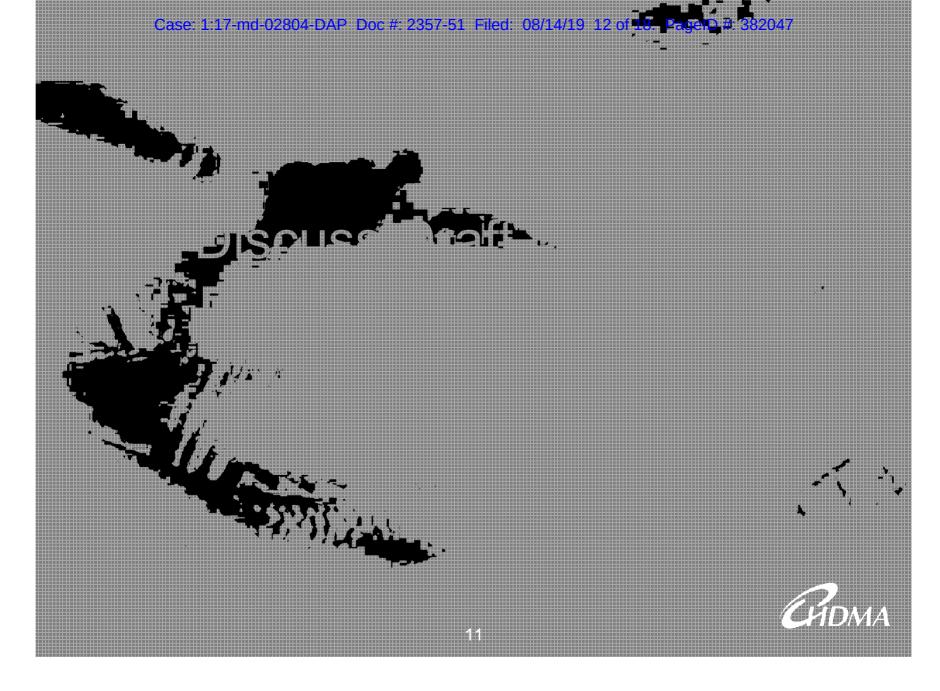
- Training is recommended
- Written SOPs

Consider possible additions, e.g.,

- Audits?
- Customer Accreditation program?
- DEA liaison?
- Questionable registrants?
- Written notices to DEA?
- Updating Customer information?

CHDMA

10



- GPPC Review

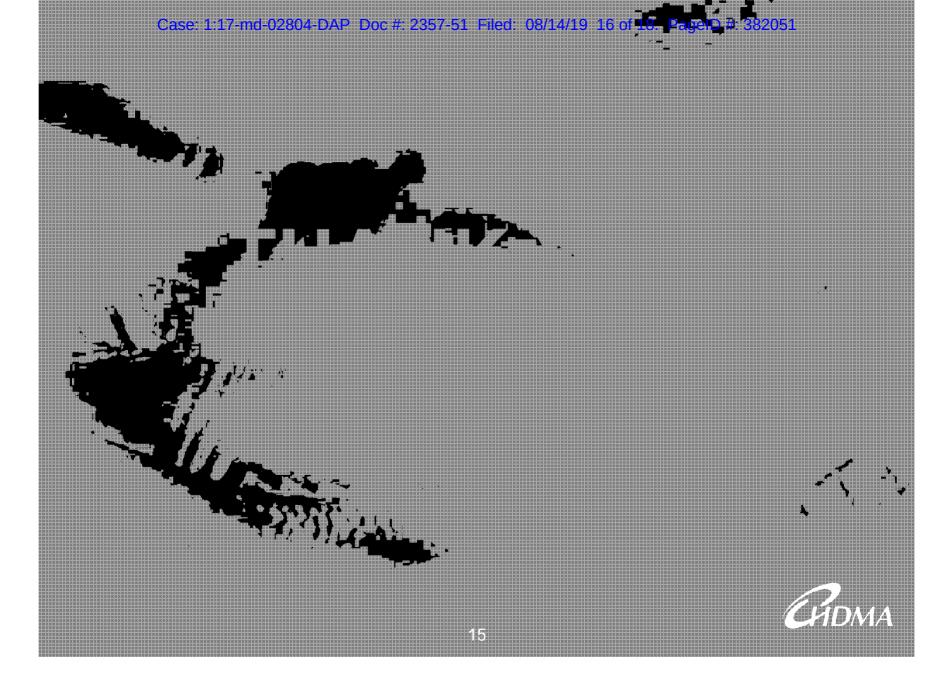
 Feb. 12
- HDMA Exec. Committee Review Feb. 22
- Request meeting with DEA Acting
 - Administrator
 - Should the BP's become a regulation?
- Supply Chain Partner Best Practices (?)

Guidance letter under internal DEA review

 Letter will say registration required – even for controlled substances registrants

Distribution prior to obtaining registration ();

- Advisory being implemented
- Request for monthly eligible registrant list updates
 - DEA will consider the request
- Increases in 10 mgs



- Request the DEA develop/send ARCOS analysis of trends, for distbors to use to develop SO systems
 - By drug type
 - By state and/or region
- Have Pharmacies report Rx data
 - May have to be at state level
 - May require federal legislation
- Support a dual system allow some orders to be filled but not others e.g.
 - Clarify suspicious "transactions" vs. "orders" allow certain transactions with reporting, but stop the SO's

16

- Enhance DEA and/or state pharmacy oversight
 - inspections
 - registration requirements (?)
- Suggest DEA support/develop a transaction review & exception process
 - Work with DEA to form criteria; better definitions; standards
 - Have DEA give "permission" to ship if criteria are met
- Legal challenge
 - May requires extensive justification, e.g., DEA changed a 30 year reporting requirement to stopping transactions